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Attorney for Defendant LV Real Estate Strategic
6 *Investment Group LLC Series 2679*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 WELLS FARGO BANK, N.A., a national
11 banking association,
Plaintiff,
12 vs.

Case No.: 2:16-cv-02363-JCM-GWF

13 LV REAL ESTATE STRATEGIC
14 INVESTMENT GROUP LLC SERIES 2679, a
Nevada limited-liability company; REDROCK
15 PARK HOMEOWNER'S ASSOCIATION, a
Nevada non-profit corporation; ATC
16 ASSESSMENT COLLECTION GROUP,
LLC, a Nevada limited-liability company;
17 Defendants.
18

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
OPPOSITIONS TO PENDING
MOTION FOR SUMMARY
JUDGMENT
(Second Request)**

19
20 Defendant LV Real Estate Strategic Investment Group, LLC Series 2679 (hereinafter
21 **"LV Real Estate"**), Defendant Redrock Park Homeowner's Association (the "HOA"), and
22 Plaintiff Wells Fargo Bank, N.A. ("hereinafter **Wells Fargo**") (collectively, the "Parties"), by
23 and through their respective counsels of record, hereby submit the following second request
24 for a Stipulation and Order to extend the deadline for filing oppositions and commensurately
25 extending deadlines for filing replies in support of pending dispositive motions.
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1 WHEREAS, on December 13, 2017, this Court entered an order (ECF No. 32) setting a
2 briefing schedule for a dispositive motion based on the federal foreclosure bar.

3 WHEREAS on December 27, 2017, Wells Fargo filed its Motion for Summary
4 Judgment. ECF No. 33.

5 WHEREAS on January 25, 2018, the Parties filed a first Stipulation for an extension of
6 time (ECF No. 43) that the Court approved on January 31, 2018 (ECF No. 44) permitting
7 responses by February 7, 2018.

8 WHEREAS, the Parties are in potentially final stages of a settlement negotiation, which
9 started in mid-January and which continues to day this Second Request is filed, with terms of
10 settlement continuing to narrow significantly such that the parties believe a settlement is both
11 possible and now likely.

12 THEREFORE, the Parties stipulate and agree to extend the deadlines for opposition to
13 Wells Fargo's Motion for Summary Judgment by 30 days to permit the parties time to attempt
14 to complete such settlement negotiations.

15 WHEREFORE, based on the foregoing,
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21 IT IS HEREBY STIPULATED AND AGREED that the deadline for oppositions to
22 Wells Fargo's Motions for Summary Judgment should be extended to March 7, 2018. And the
23 deadline for Wells Fargo to file any reply is 21 days from the date of any opposition, or March
24 28, 2018. The Parties stipulate and agree to the foregoing in good faith. This Stipulation is
25 made for the benefit and convenience of the Parties and is not intended to delay the proceedings
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1 in this case. This is the Parties' second request to extend the briefing schedule that was
2 originally established by the Court's December 13, 2017 order.
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4 IT IS SO STIPULATED.
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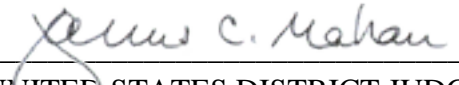
6 DATED: February 6, 2018.

7 SNELL & WILMER L.L.P.	BRAUER, DRISCOLL, SUN AND
8 <u>/s/ Wayne Klomp</u>	ASSOCIATES, LLC
9 Wayne Klomp, Esq.	<u>/s/ Jeff Brauer</u>
10 Nevada Bar No. 10109	Jeff Brauer, Esq.
11 John S. Delikanakis, Esq.	Nevada Bar No. 13834
Nevada Bar No. 5928	Henderson, Nevada 89074
Reno, Nevada 89501-1961	<i>Attorneys for Defendant LV Real Estate Strategic</i>
<i>Attorneys for Plaintiff Wells Fargo Bank, N.A.</i>	<i>Investment Group LLC</i>

12 TYSON & MENDES LLP
13 /s/ Christopher Lund
14 Thomas E. McGrath, Esq.
15 Nevada Bar No. 7086
16 Christopher Ammond Lund
17 Nevada Bar No. 12435
Las Vegas, Nevada 89123
Attorneys for Defendant Redrock Park
Homeowner's Association

20 Case No.: 2:16-cv-02363-JCM-GWF

21 IT IS SO ORDERED:

22 
23 UNITED STATES DISTRICT JUDGE,

24 DATED: February 8, 2018
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Respectfully submitted by:
Brauer, Driscoll, Sun and Associates LLC

 /s/ Jeff J. Brauer, Esq

Jeff Brauer Esq.

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Attorney for Defendant LV Real Estate Strategic Investment Group LLC Series 2679

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 6, 2018, I electronically filed the foregoing with the
3 Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF
4 system. Participants in the case who are registered CM/ECF users will be served by the
5 CM/ECF system.

6 /s/ Jeff Brauer

7 Jeff Brauer, Esq. an employee of BRAUER, DRISCOLL, SUN AND ASSOCIATES LLC
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